

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 18-13947**
Stacy A McCauley Cooney : **Chapter 13**
: **Judge Magdeline D. Coleman**
Debtor(s) : * * * * *
:
Nationstar Mortgage LLC d/b/a Mr. : **Related Document #**
Cooper :
Movant, :
vs :
:
Stacy A McCauley Cooney :
:
William C. Miller :
Respondents.

**NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER'S NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor") by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting July 1, 2020 through December 1, 2020. Creditor holds a secured interest in the real property commonly known as 313 Beechtree Dr, Broomall, PA 19008. Creditor filed a proof of claim as claim number 6.

Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance

period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume mortgage payments beginning January 1, 2021 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its right to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Nationstar Mortgage LLC d/b/a Mr. Cooper's Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105, ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Stacy A McCauley Cooney, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on July 29, 2020:

Stacy A McCauley Cooney, 313 BeechTree Drive, Broomall, PA 19008

Stacy A McCauley Cooney, 313 Beechtree Dr, Broomall, PA 19008

Asset Acceptance, LLC, P.O. Box 1630, Warren, MI 48090

Pennsylvania Department of Revenue, 110 N 8th St Ste 204b, Philadelphia, PA 19107

PNC Bank, 300 Fifth Avenue, Pittsburgh, PA 15222

DATE: July 29, 2020

/s/ Karina Velter

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